

1 **JOEL F. HANSEN, ESQ.**
Nevada Bar No. 1876
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6
7 **IN THE UNITED STATES DISTRICT COURT**
8 **FOR THE DISTRICT OF NEVADA**
9

10 CLIVEN BUNDY,

11 Plaintiff,

12 v.

13 GLORIA NAVARRO, et al.,

14 Defendants.
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Case No.: 2:16-cv-1047-JAD-GWF

**MOTION FOR EXTENSION OF TIME FOR
PLAINTIFF TO FILE MANDATORY
STIPULATED DISCOVERY PLAN AND
SCHEDULING ORDER**

16 COMES NOW, the Plaintiff, CLIVEN BUNDY, by and through his attorney, Joel F.
17 Hansen, Esq., and moves this Honorable Court for an extension of time to comply with the
18 Court's Order of September 14, 2016, Document No. 38, regarding the parties' failure to file a
19 proposed stipulated discovery plan and scheduling order.
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21 Plaintiff's attorney, Joel F. Hansen, is in the process of withdrawing for health reasons
22 from the *United States v. Bundy et al.* case, a criminal case of which the Court is undoubtedly
23 well aware. Mr. Hansen is also in the process of searching for counsel to take his place as the
24 attorney for Mr. Bundy in both the criminal case and in the case at bar. Due to Mr. Hansen's
25 health problems, due to financial problems involving the case, and due to the fact that Mr. Larry
26 Klayman, Esq., has not achieved pro hac vice status in Nevada as of yet, although his Emergency
27 Petition for Writ of Mandamus is currently pending before the Ninth Circuit, due to all of these
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1 factors, the mandatory stipulated discovery plan and scheduling order has not been completed as
2 of today's date.

3 Wherefore, it is hereby requested and moved that this Court grant an additional thirty (30)
4 days up to and including October 23, 2016, to comply with the provisions of LR 26-1 of the
5 Federal Rules of Civil Practice for the District of Nevada.

6 Dated: September 30, 2016

Respectfully Submitted,

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8 By: /s/ Joel F. Hansen

JOEL F. HANSEN, ESQ.

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17 **CERTIFICATE OF SERVICE**

18 I HEREBY CERTIFY that service of the foregoing **MOTION FOR EXTENSION OF**
19 **TIME FOR PLAINTIFF TO FILE MANDATORY STIPULATED DISCOVERY PLAN**
20 **AND SCHEDULING ORDER** was made through the Court's CM/ECF filing and service
system on all counsel of record, including the below-designated counsel, on September 30, 2016:

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27 /s/ Joel F. Hansen
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